



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

January 10, 2025

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Nadine Menendez,*
S4 23 Cr. 490 (SHS)**

Dear Judge Stein:

The Government respectfully encloses in the above-captioned matter a redline to the Court's jury charges as given at the trial of the defendant's co-defendants last year. This redline reflects the Government's present proposed jury charges, with footnotes to explain briefly certain of the Government's proposals or to respond briefly to certain of the defendant's apparent objections in the redline that she filed earlier this evening (Dkt. 696). The Government will provide additional authority or explanation for its proposals, or respond further to the defendant's proposals, upon request.

The Government also respectfully reserves the right to request additional revisions or modifications to the Court's jury charges based on developments at trial, e.g., to request a conscious avoidance charge (*see* Dkt. 354 (Gov't Requests to Charge) at 38-40).

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Respectfully submitted,

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Chief Counsel to the Acting United States Attorney
Attorney for the United States, Acting under
Authority Conferred by 28 U.S.C. § 515

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Enclosure

cc: (by ECF)

Counsel of Record